

LAW OFFICES OF
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May 26, 2021

VIA ECF

MEMO ENDORSED

Hon. Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States of America v. Christian Baez*, 19 Cr. 690 (KPF)

Dear Judge Failla,

I am counsel to defendant Christian Baez in the above-captioned case. I write to respectfully request a modification of my client's pretrial release status. Mr. Baez is seeking to make a one-day trip outside of his specified judicial districts to attend a family friend's baby shower on June 5, 2021. The baby shower will occur from 6:30pm to 10:30pm at River View Banquet Center, 56 River Road, Berkeley Heights, NJ 07922. The travel time from Mr. Baez's home to the location is approximately an hour and a half to two hours depending on traffic. Accordingly, I respectfully request Mr. Baez be permitted to travel to the desired location in the District of New Jersey from 4:30pm on June 5, 2021 to 12:30am on June 6, 2021. Pretrial and the Government do not object to this request.

Thank you for your attention to this matter.

Very truly yours,



Daniel A. McGuinness

Cc: All Counsel (via ECF)

Application GRANTED.

SO ORDERED.

Dated: May 27, 2021
 New York, New York



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE